

**From:** [Eyth, Alison](#)  
**To:** [Palma, Elizabeth](#)  
**Subject:** FW: <resolution of how to respond> RE: 2023 NODA comment re 3 IL refineries  
**Date:** Wednesday, October 10, 2018 11:02:37 PM

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**From:** Tooly, Lee  
**Sent:** Tuesday, August 08, 2017 2:49 PM  
**To:** Allen, Chris <Allen.Chris@epa.gov>; Vukovich, Jeffrey <Vukovich.Jeffrey@epa.gov>; Farkas, Caroline <farkas.caroline@epa.gov>  
**Cc:** Eyth, Alison <Eyth.Alison@epa.gov>  
**Subject:** <resolution of how to respond> RE: 2023 NODA comment re 3 IL refineries

Re item 2) below... this is what I referred to as a possible generic reference of control efficiency via CoST, and associated materials:

<https://www.epa.gov/criteria-air-pollutants/menu-control-measures-naaqs-implementation>

Given that you were able to confirm that NOx control is presently applied to the specific process heaters at the refinery in question, I think that should constitute the response.

Lee

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**From:** Allen, Chris  
**Sent:** Tuesday, August 08, 2017 2:35 PM  
**To:** Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>; Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>  
**Cc:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>  
**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Here is a summary of what we discussed:

1) For the Conoco facility, a facility-wide control from the consent decree control packet is currently in effect for 2023, which reduces NOX by 14.3%. Based on the 2011-2015 emissions reductions at the ultra-LNB units that Lee identified 14.3% reduction is not enough. For those units, we will add a unit-specific control to the same control packet, where the % reduction is based on the 2011-2015 trend (which for these units is > 14.3%). These new unit-specific controls will override the existing facility-wide control at these units only.

2) For the Citgo facility, there is currently a 29.5% NOX control in effect at the relevant units from this control packet: CONTROL\_2011v6\_2\_2025\_NOX\_Process\_heaters\_09dec2014\_11dec2014\_v0

Lee is going to look up whether a standard NOX control for a Low NOX Burner is greater than 29.5%. If not, then the current controls from the Process Heaters control packet are sufficient.

3) For the Marathon facility, the controls that will be introduced by NSPS Subpart Ja for Flares will

provide a more than sufficient emissions reduction.

- Chris

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CHRIS ALLEN

Research Scientist

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[allen.chris@epa.gov](mailto:allen.chris@epa.gov) | [www.csra.com](http://www.csra.com)

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**From:** Tooly, Lee

**Sent:** Tuesday, August 08, 2017 12:42 PM

**To:** Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>;  
Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>

**Cc:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

I just put 1:30 on our calendars w conf line -4248. Lee

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**From:** Allen, Chris

**Sent:** Tuesday, August 08, 2017 11:59 AM

**To:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>; Vukovich, Jeffrey  
<[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>; Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

How about 2:00? Looks like Caroline is also available then. I don't know if I'm "authorized" to reserve a conference line myself, but if it only ends up being the two of us then I could just call you directly.

- Chris

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**From:** Eyth, Alison

**Sent:** Tuesday, August 08, 2017 11:43 AM

**To:** Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>; Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>; Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

You can meet without me – I don't have any time today...

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**From:** Tooly, Lee

**Sent:** Tuesday, August 08, 2017 11:42 AM

**To:** Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>; Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Chris, perhaps the best thing to do is to look for/ schedule 15 mins on our calendars?

As far as I know, there has been no discussion/ agreement here regarding my proposals noted in col F on how the comments might be resolved.

Lee

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**From:** Allen, Chris

**Sent:** Tuesday, August 08, 2017 11:06 AM

**To:** Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>; Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Cc:** Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Hi all,

I've looked over the IL refineries workbook. When would be a good time to have a call to discuss? Any time before 4 works for me.

- Chris

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**From:** Tooly, Lee

**Sent:** Wednesday, August 02, 2017 3:20 PM

**To:** Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Sounds like Tues will give you time to look over the workbook, that works for me. Perhaps Alison, JV, and I can discuss in the meantime by end of this week.

In the workbook, primary sheets are the first 2 sheets – Overview; and in the second sheet, see cols E and F.

The rest of materials in the workbook are the supporting background data.

Lee

Rebecca Lee Tooly, MSPH; CAPT, U.S. Public Health Service

U.S. EPA | Office of Air Quality Planning & Standards | Air Quality and Analysis Division, Emissions Inventory & Analysis Group | Research Triangle Park, NC | 919-541-5292

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**From:** Allen, Chris

**Sent:** Wednesday, August 02, 2017 3:08 PM

**To:** Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>; Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

I'm out Thu/Fri...so maybe we schedule for Tuesday? (Or squeeze it in between now and 4:00 PM today? I haven't fully looked over the workbook yet though.)

- Chris

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[allen.chris@epa.gov](mailto:allen.chris@epa.gov) | [www.csra.com](http://www.csra.com)

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**From:** Tooly, Lee

**Sent:** Wednesday, August 02, 2017 3:03 PM

**To:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

No - I am not in Monday... I am in tomorrow (Th) and Fri – then back on Tues next week. Lee

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**From:** Eyth, Alison

**Sent:** Wednesday, August 02, 2017 2:59 PM

**To:** Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Cc:** Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Chris,

I think so. Lee are you in on Monday?

Alison

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**From:** Allen, Chris

**Sent:** Wednesday, August 02, 2017 2:50 PM

**To:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Hi,

Should we schedule a call for next Monday with Lee to discuss the Illinois refinery workbook? Any time Monday works for me (outside our call of course, but I guess we could invite Lee to our call also).

- Chris

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CHRIS ALLEN

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**From:** Eyth, Alison

**Sent:** Sunday, July 30, 2017 10:09 AM

**To:** Allen, Chris <[Allen.Chris@epa.gov](mailto:Allen.Chris@epa.gov)>; Beidler, James <[Beidler.James@epa.gov](mailto:Beidler.James@epa.gov)>

**Subject:** FW: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Here is a little more info from Caroline on this.

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**From:** Farkas, Caroline

**Sent:** Friday, July 28, 2017 2:51 PM

**To:** Tooly, Lee <[Tooly.Lee@epa.gov](mailto:Tooly.Lee@epa.gov)>

**Cc:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>

**Subject:** RE: 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Alison/Jeff,

Lee and I just spoke via phone and she went over this worksheet with me. The consent decrees in the IERG NODA comment apply to 3 facilities in Illinois. If you look at the 2<sup>nd</sup> sheet in her workbook (IERGcmnts\_ILRefinCDs\_response), column F has Lee's suggestions from how we proceed forward. It appears that at least for 2 of the 3 consent decrees, we could have CSRA apply an emission reduction based on 2011-2015 emission changes on a unit-basis. Lee has already calculated this information for each of the facilities and all of their units for NOx, SO2, and VOCs in the three sheets that start with "chart". For the final consent decree, Lee suggests assuming that a low NOx boiler will be installed by 2017/2019 and just apply a standard NOx control to the 3 specific heater units. This is not something I am very familiar with, but Lee said she would be willing to speak with you both about this next week and decide how to proceed to get this to CSRA in time for their 2023 processing.

I will be reachable via email for about another 45 min. Let me know if you need anything else from me.

Thank you!

Caroline

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**From:** Tooly, Lee  
**Sent:** Friday, July 28, 2017 10:52 AM  
**To:** Farkas, Caroline <[farkas.caroline@epa.gov](mailto:farkas.caroline@epa.gov)>  
**Cc:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>; Vukovich, Jeffrey <[Vukovich.Jeffrey@epa.gov](mailto:Vukovich.Jeffrey@epa.gov)>  
**Subject:** 2023 NODA comment re 3 IL refineries: My workbook w possible options for EPA response

Hi Caroline, This a follow-up from yesterday's meeting discussion about how we might respond to subject comment. Alison and Jeff are copied cause I am not sure you will be able to process/ resolve this by end of your day.

But if you get into this before your day concludes, let me know what questions come up.

The attached workbook contains my findings from investigating the specific comments that we received from the IL ERG.

The overview sheet outlines the steps I took to investigate the comments received, and provides a description of each sheet in the workbook.

The sheet <IERGcmts\_ILRefinCDs\_response> summarizes the following:

IERG comment by EIS-facility and related data; references for consent decrees; CD conditions targeted by IERG comment; summary of what the EIS data shows; confirmation of existing control packet that assigns a control factor to the specific facility/unit; *and some possible options for responding to comment.*

I think the next step is to review the option(s) I have listed and determine if it is reasonable way to proceed. There may be other options that you all can think of after assessing this information.

From yesterday's discussion, believe that at minimum, the desired outcome is to determine the best option for response and if it is to include development of a control assumption, outline how that is to be done per applicable EIS facility/unit.

I wish you a wonderful trip and an uneventful journey ☺ !

Take good care,

Lee

<< File: IL\_RefineryCDs\_IERGcomment\_NODA2018\_Itwork.xlsx >>

